

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

Facebook Username: Billionair Chaser
Facebook User ID: 100027902438132
<https://www.facebook.com/billionair.chaser>

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Case No.

19-M-086

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B

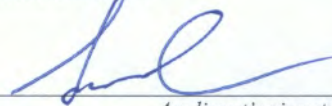
The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: Title 18, United States Code, 922(g)(1) and Title 18, and United States Code, 922(d)

The application is based on these facts: See attached affidavit.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



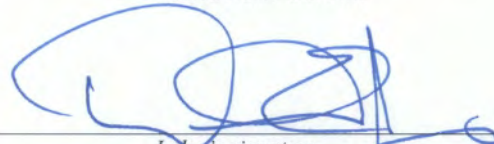
Applicant's signature

Special Agent Sean Carlson, ATF

Printed Name and Title

Sworn to before me and signed in my presence:

Date: April 23, 2019



Judge's signature

City and State: Milwaukee, Wisconsin

Honorable David E. Jones

U.S. Magistrate Judge

Printed Name and Title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Sean Carlson, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain Facebook user IDs that are stored at premises owned, maintained, controlled, or operated by Facebook, a social networking company headquartered in Menlo Park, California. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Facebook to disclose to the government records and other information in its possession, pertaining to the subscribers or customers associated with the user IDs.

2. It is believed that the information associated with the Facebook User ID 100027902438132 may contain evidence of violations of Title 18, United States Code, 922(g)(1) (felon in possession of a firearm), and Title 18, and United States Code, 922(d) (sale or transfer of firearm to a prohibited person). As a result, a request is submitted for a search warrant to review information associated with the aforementioned Facebook User ID. The information to be searched is described in the following paragraphs and in Attachment A.

3. I have been employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since November of 2015. As an ATF SA, I have participated in numerous investigations regarding the unlawful possession of firearms by convicted felons and conducted investigations related to the unlawful use of firearms, firearms trafficking, drug trafficking, and arson. Also, in preparation for employment as an ATF SA, I

attended the Federal Law Enforcement Training Center, and received considerable training in firearm trafficking investigation, as well as Federal firearm law.

4. Prior to my employment at ATF, I was a police officer for over four (4) years with the Hammond Police Department in Hammond, Indiana.

5. I have participated in several firearms trafficking investigations that involved the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these computers, cellular phones, cameras, and other digital storage devices. In many occasions, this electronic data has provided evidence of the crimes being investigated and corroborated information already known or suspected by law enforcement.

6. Furthermore, I know from training and experience it is common for drug users, drug dealers, firearms traffickers, and firearms straw purchasers to communicate via cellular phone through a variety of electronic media. It is also common for firearm traffickers and straw buyers to communicate through cellular phones and electronic media. Drug dealers also act as firearms traffickers by utilizing the non-prohibited status (no felony convictions) of drug users to obtain firearms. Ultimately, these firearms are used by the drug trafficking organization to protect and secure their goods and territory. The participants in these organizations can use text (SMS) messaging, phone calls, electronic mail, messaging applications, and various social media applications such as Facebook or Twitter.

7. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

II. ITEMS TO BE SEARCHED

8. The Facebook page belonging to Rayshawn WILLIAMS, herein described as a personal website that is accessed with a username and password specific only to that page and further described in Attachment A. The following Facebook Page URL, Facebook Usernames, and associated Facebook Identifications Numbers:

- <https://www.facebook.com/billionair.chaser>
- Facebook Username: Billionair Chaser, Facebook User ID: 100027902438132

The applied-for warrant would authorize the search and recovery of evidence particularly described in Attachment B.

III. PROBABLE CAUSE

9. ATF SA Richard Connor and I are investigating Rayshawn D. WILLIAMS (DOB: 1991). WILLIAMS is suspected in shootings that occurred on January 4, 2019 and April 10, 2019 in Milwaukee, WI. In the April 4, 2019 shooting it is believed that WILLIAMS fired multiple .45 caliber shots and struck victim, S.T., in the leg and abdomen. The shooting involved a dispute over the quality of the marijuana that WILLIAMS sold to S.T.

10. On April 2, 2019, ATF SA Richard Connors and I conducted an interview with a source of information (SOI) in reference to ongoing criminal activity of SOI stated to investigators that Rayshawn D. WILLIAMS (b/m, DOB 09/30/1991), is in possession of an "AK-47" style rifle, which he has in his possession at all times. SOI stated WILLIAMS keeps the firearm because he uses it to conduct armed robberies. SOI stated WILLIAMS is a convicted felon. For several reasons, case agents believe that the SOI is reliable and credible. First, SOI is a close relative to WILLIAMS. Second, information provided by SOI is consistent with evidence obtained elsewhere in this investigation where SOI was not utilized, and substantial portions of

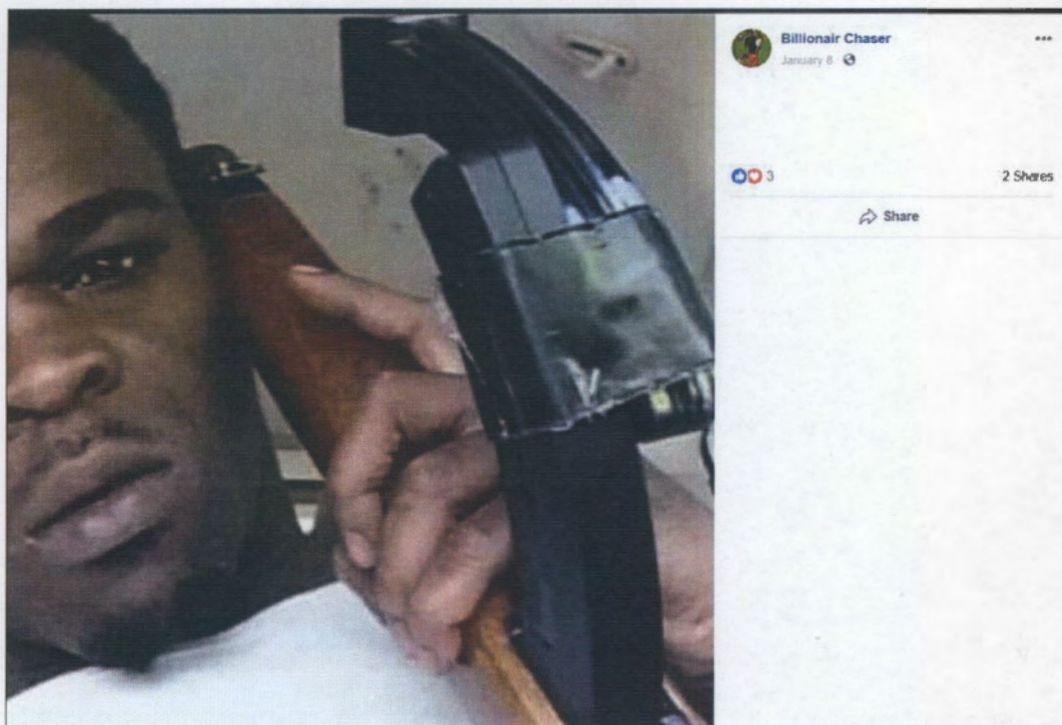
SOI's information have been corroborated through independent investigation. Third, the SOI has made statements to case agents that are against his/her penal interests. The SOI is cooperating in exchange for consideration of an existing state of Wisconsin criminal investigation against the SOI.

11. SOI stated WILLIAMS uses the Facebook profile "Chasin Billionaire."

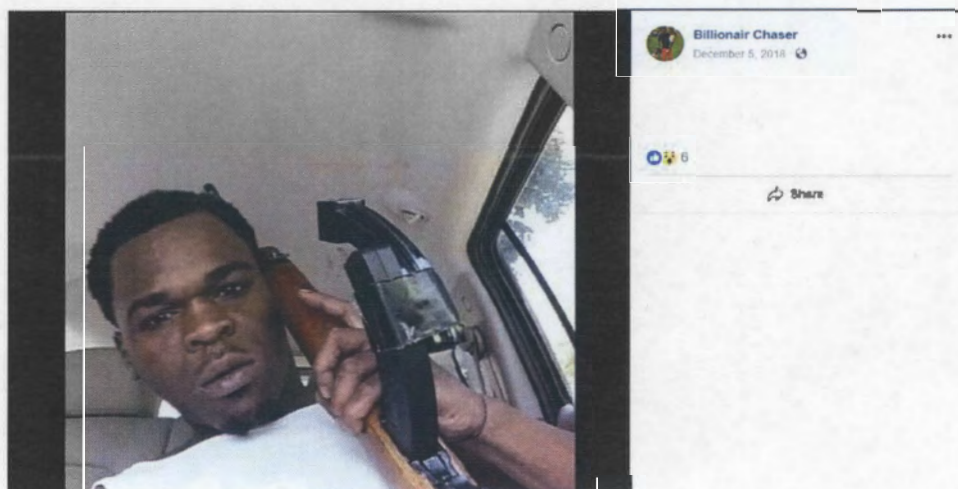
12. On April 02, 2019, I reviewed the criminal history of Rayshawn WILLIAMS, and located the following felony convictions, which prohibit him from possessing a firearm:

- 06/28/2010: WILLIAMS was convicted of "Drive or Operate Vehicle w/o Consent" (Felony I) in Milwaukee County Circuit Court case number 2010CF000208;
- 06/28/2010: WILLIAMS was convicted of "Armed Robbery" (Felony C) in Milwaukee County Circuit Court case number 2010CF002368;
- 11/15/2013: WILLIAMS was convicted of "Drive or Operate Vehicle w/o Consent" (Felony I) in Milwaukee County Circuit Court case number 2013CF002478.

13. On April 18, 2019, I located and viewed the publicly visible photographs associated with the Facebook profile "Billionair Chaser" (Facebook ID: 100027902438132). Prior to conducting a review of this Facebook profile, I reviewed a Milwaukee Police Department booking photograph for Rayshawn WILLIAMS. I was then able to determine that Rayshawn WILLIAMS is depicted in the photographs displayed within the "Billionair Chaser" Facebook profile. During the review of the publicly visible profile "Billionair Chaser," I located the following photographs:



- On January 08, 2019, WILLIAMS posted the above photograph. I am aware through training and experience that this photo shows WILLIAMS holding what appears to be a rifle with a “banana clip” style magazine to his head. It is common for those engaged in criminal activity to post photographs on social media that glorify their criminal activity, such as the illegal possession of firearms, in order to further their criminal reputation and social stature among their peers.



- On December 5, 2018, WILLIAMS posted the above photograph which appears to be an uncropped version of the photograph referenced above. Your affiant believes from training and experience that the firearm displayed in this photograph is an actual rifle based on the materials in which the rifle appears to be crafted. The area in which the magazine is to be inserted into the firearm is seemingly in the correct spot, and appears to be crafted of metal, consistent with that of a functioning firearm.



- On November 15, 2018, WILLIAMS posted the above photograph which shows him pointing what appears to be a black pistol at the camera. WILLIAMS appears to be holding the firearm with his trigger finger extended horizontally down the slide and off of the trigger. Individuals familiar with firearm safety would hold a legitimate firearm in this manner in order to prevent an accidental discharge of the firearm. Based on this observation, your Affiant believes the firearm WILLIAMS is holding in this photograph is a functioning firearm.



- On November 15, 2018, WILLIAMS posted the above photograph in which he appears to have a black pistol tucked into his waistband. The firearm displayed in this photograph is consistent in appearance with a Hi-Point manufactured pistol (see photograph below).



- The above referenced photograph is a stock photo of a Hi-Point manufactured pistol. As can be observed in this photograph, Hi-Point pistols can be identified by the unique drastic tapering that occurs from the grip of the firearm into the slide, which appears consistent in both photographs. Your affiant is also aware through training and experience that Hi-Point model firearms are inexpensive and commonly bought and sold because they are easily disposable after the commission of crimes.

14. I believe the Facebook account belonging to WILLIAMS will contain additional evidence related to WILLIAMS' illegal possession of firearms.

GENERAL FACEBOOK INFORMATION

15. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

16. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

17. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

18. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

19. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their

whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

20. Facebook allows users to upload photos and videos, which may include any metadata such as location that the user transmitted when s/he uploaded the photo or video. It also provides users the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos and videos associated with a user’s account will include all photos and videos uploaded by that user that have not been deleted, as well as all photos and videos uploaded by any user that have that user tagged in them.

21. Facebook users can exchange private messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the

account. Facebook also has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

22. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

23. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as webpages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

24. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

25. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

26. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs (“blogs”), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

27. The Facebook Gifts feature allows users to send virtual “gifts” to their friends that appear as icons on the recipient’s profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other “pokes,” which are free and simply result in a notification to the recipient that he or she has been “poked” by the sender.

28. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

29. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications (“apps”) on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

30. Some Facebook pages are affiliated with groups of users, rather than one individual user. Membership in the group is monitored and regulated by the administrator or head of the group, who can invite new members and reject or accept requests by users to enter. Facebook can identify all users who are currently registered to a particular group and can identify the administrator and/or creator of the group. Facebook uses the term “Group Contact Info” to describe the contact information for the group’s creator and/or administrator, as well as a PDF of the current status of the group profile page.

31. Facebook uses the term “Neoprint” to describe an expanded view of a given user profile. The “Neoprint” for a given user can include the following information from the user’s profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook group identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications.

32. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP

address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user's IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

33. Social networking providers like Facebook typically retain additional information about their users' accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider's support services, as well as records of any actions taken by the provider or user as a result of the communications.

34. As explained herein, information stored in connection with a Facebook account may provide crucial evidence of the "who, what, why, when, where, and how" of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, a Facebook user's "Neoprint," IP log, stored electronic communications, and other data retained by Facebook, can indicate who has used or controlled the Facebook account. This "user attribution" evidence is analogous to the search for "indicia of occupancy" while executing a search warrant at a residence. For example, profile contact information, private messaging logs, status updates, and tagged photos (and the data associated with the foregoing, such as date and time) may be evidence of who used or controlled the Facebook account at a relevant time.

Further, Facebook account activity can show how and when the account was accessed or used. For example, as described herein, Facebook logs the Internet Protocol (IP) addresses from which users access their accounts along with the time and date. By determining the physical location associated with the logged IP addresses, investigators can understand the chronological and geographic context of the account access and use relating to the crime under investigation. Such information allows investigators to understand the geographic and chronological context of Facebook access, use, and events relating to the crime under investigation. Additionally, Facebook builds geo-location into some of its services. Geo-location allows, for example, users to "tag" their location in posts and Facebook "friends" to locate each other. This geographic and timeline information may tend to either inculcate or exculpate the Facebook account owner. Last, Facebook account activity may provide relevant insight into the Facebook account owner's state of mind as it relates to the offense under investigation. For example, information on the Facebook account may indicate the owner's motive and intent to commit a crime (e.g., information indicating a plan to commit a crime), or consciousness of guilt (e.g., deleting account information in an effort to conceal evidence from law enforcement).

35. Therefore, the computers of Facebook are likely to contain all the material described above, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

INFORMATION TO BE SEARCHED AND ITEMS TO BE SEIZED

36. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information

(including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

IV. CONCLUSION

37. Based on the forgoing, I request that the Court issue the proposed search warrant. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court of the Eastern District of Wisconsin is a district court of the United States that has jurisdiction over the offense(s) being investigated, 18 U.S.C. § 2711(3)(A)(i). Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

ATTACHMENT A

Property to Be Searched:

This warrant applies to information between April 18, 2018 and present date associated with the following Facebook pages:

- <https://www.facebook.com/billionair.chaser>
- Facebook Username: Billionair Chaser, Facebook User ID: 100027902438132

ATTACHMENT B
Particular Things to be Seized

Information to be disclosed by Facebook

To the extent that the information described in Attachment D is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each user ID listed in Attachment A:

- a. All contact and personal identifying information, including: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.
- b. All activity logs for the account and all other documents showing the user's posts and other Facebook activities;
- c. All photos uploaded by that user ID and all photos uploaded by any user that have that user tagged in them;
- d. All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the user is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the user's access and use of Facebook applications;
- e. All other records of communications and messages made or received by the user,

including all private messages, chat history, video calling history, and pending "Friend" requests;

- f. All "check ins" and other location information;
- g. All IP logs, including all records of the IP addresses that logged into the account;
- h. All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook webpages and content that the user has "liked";
- i. All information about the Facebook pages that the account is or was a "fan" of;
- j. All past and present lists of friends created by the account;
- k. All records of Facebook searches performed by the account;
- l. All information about the user's access and use of Facebook Marketplace;
- m. The types of service utilized by the user;
- n. The length of service (including start date) and the means and source of any payments associated with the service (including any credit card or bank account number);
- o. All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the account;
- p. All records pertaining to communications between Facebook and any person regarding the user or the user's Facebook account, including contacts with support services and records of actions taken.

Information to be seized by the government

All information described above that constitutes fruits, evidence and instrumentalities of violations of Title 18, United States Code, 922(g)(1) (felon in possession of a firearm), and Title 18, and United States Code, 922(d) (sale or transfer of firearm to a prohibited

person), since April 18, 2018 to the present, for each user ID identified on Attachment A, information pertaining to the following matters:

- a. The relevant offense conduct;
- b. Evidence indicating how and when the Facebook account was accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- c. Evidence indicating the Facebook account owner's state of mind as it relates to the crime under investigation;
- d. The identity of the person(s) who created or used the user ID, including records that help reveal the whereabouts of such person(s).
- e. The identity of the person(s) who communicated with the user ID about matters relating to relevant offense conduct of the above-listed crimes, including records that help reveal their whereabouts.
- f. Based on the forgoing, I request that the Court issue the proposed search warrant based on the aforementioned facts.